

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN (Grand Rapids)**

In re:
John Paul Hysell and
Vicki Lynn Hysell
fka Vicki L Bekins

Debtors.

Chapter 13 No. 20-03270-swd

Hon. Scott W. Dales

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OBJECTIONS TO CONFIRMATION

NOW COMES Towne Mortgage Company ("Creditor"), by and through its attorneys, Trott Law, P.C., and hereby Objects to Confirmation as follows:

1. Creditor is a holder of a mortgage on real property owned by the Debtor(s) and located at 1363 W 32nd St, Holland, MI 49423-6780.
2. Debtor(s) Chapter 13 Plan proposes to pay Creditor a regular monthly payment of \$815.00 directly.
3. According to Creditor's records, Creditor must receive the regular monthly payment of \$798.70 plus a pre-petition arrearage of approximately \$2,238.64 to be cured within a reasonable length of time.
4. Debtor(s) proposed Chapter 13 Plan fails to provide treatment for the pre-petition arrearage.
5. Pursuant to 11 U.S.C. §§ 1322(a)(1) and (b)(5) the Debtor(s) Plan is underfunded.
6. Debtor(s) Chapter 13 Plan cannot be confirmed pursuant to 11 U.S.C. § 1325 as it fails to comply with the requirements of 11 U.S.C. §§ 1322(b)(3) and (b)(5).

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WHEREFORE, Creditor prays that Confirmation be denied, the bankruptcy case dismissed, and for whatever other relief the Court deems just and equitable.

Respectfully Submitted,
Trott Law, P.C.

Dated: May 4, 2021

/s/ Robert J. Shefferly

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